FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) Renewal

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

and

HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-AIR POLLUTION CONTROL DIVISION-

HT Aluminum Specialties, Inc.
6340 Indianapolis Boulevard
Hammond, Indiana 46320

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: **F089-14952-00207**	
Issued by: _____ Ronald L. Novak, Director Hammond Department of Environmental Management	Issuance Date: February 4, 2003 Expiration Date: February 4, 2008

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Hammond Department of Environmental Management (HDEM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]
The Permittee owns and operates an Aluminum Scrap and Waste Processing Plant.

Authorized Individual:	General Plant Manager
Source Address:	6340 Indianapolis Boulevard, Indiana 46320
Mailing Address:	6340 Indianapolis Boulevard, Indiana 46320
General Source Phone:	(219) 931-1927
SIC Code:	5093 – Scrap and Waste Materials
Source Location Status:	Lake County Attainment/Unclassifiable for CO, NO_2 and Lead, Primary Nonattainment for SO2, Moderate Nonattainment for PM10, and Severe Nonattainment for Ozone.
Source Status:	Federally Enforceable State Operating Permit (FESOP) Major Source under Emission Offset Rules; Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Summary [326 IAC 2-8-3(c)(3)]
This stationary source consists of the following emission units and pollution control devices:

Point No. 1: Aluminum Dross Finishing Operation

This operation is also known as Line #2 by plant personnel. This facility includes two (2) separate process lines, one for the bigger size material (+0.5 inch) and the other for the smaller size material (+30 mesh).

The +0.5 inch side includes a feed hopper where the material dumped is fed to the Chip Shredder via a bucket elevator. Each of these points is vented to the air pollution control equipment.

The +30 mesh side includes a feed hopper where the material dumped is fed to a Stedman Shredder via a bucket elevator. The material then feeds to another feed hopper, belt conveyor and Rex Mixer.

Both sides share a Rotex Screener to separate the various size materials. This unit is also drafted to the air pollution control equipment.

The maximum design rate through the entire operation is 6.55 Tons/hour.

The air pollution control equipment for this operation is an American Air Filter Dust Collector #3 (Model 141; Serial No. FR-770039) which vents through Stack 1.

A Housekeeping dust collector is used for removing dust from the work areas around Lines #1 and #2 as a health and safety precaution for the workers. A draft is provided using a dust collector, American Air Filters (AAF #4).

Point No. 2: Aluminum Dross and Grindings Unloading to Elevated Storage Silo Operation

The Aluminum Dross & Grindings Unloading to Elevated Storage Silo Operation involves the unloading of aluminum dross and grindings into an eight (8) compartment storage silo. Each compartment has a maximum capacity of 20,000 lbs. The material is unloaded and conveyed to the silo by means of a feed hopper and bucket elevator. The material then goes through a Rotex Screener, a belt conveyor, a screw conveyor, and then through a Williams Separator. The maximum amount of material unloaded is 6.35 tons/hr.

The Air Separator receives material from the small silo under the rail car pit. The Air Separator uses a blade separation method to separate the fines from the larger material. The material is then released into two (2) separate bags at the bottom of the separator.

Particulate emissions generated are controlled by an American Air Fabric Filter #1 (Model 127; Serial No. AP-750088), rated at 99% control efficiency.

Point No. 3: Aluminum Bulk Dross Processing Operation

This operation is also known as Line #1 by plant personnel. A dump truck would dump material into a Hopper/Deister Shaker Feeder which feeds the Kolbert Hopper & Feeder via a belt conveyor. The material is then fed to a Rex 7.5 yard mixer via another belt conveyor, and then through a Rotex Screener.

The maximum design rate for this facility is 6.55 Tons per hour.

Particulate matter emissions generated from this operation are controlled by a Pangborn Dust Collector (Model No. N-67; Serial No. 67-CH-3-702).

A Housekeeping dust collector is used for removing dust from the work areas around Lines #1 and #2 as a health and safety precaution for the workers. A draft is provided using a dust collector, American Air Filters (AAF #4).

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)
This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

1) **Point No. 4: Aluminum Sorting Line**

The Sorting Line consists of: (1) an initial conveyor where workers will separate the large pieces of non-aluminum material from +10 to +20 mesh aluminum dross and grindings and (2) a secondary conveyor where non-aluminum material is further separated using a “Dings” Eddy Current Separator. The Eddy Current Separator uses a magnetic rotor to repel aluminum grindings farther than nonmetallic material.

Emissions are generated by the delivery of material to the line and removal of material from the end of the line. The maximum design rate for this facility is 6 tons per hour. No air pollution control equipment is used for this line.

2) Miscellaneous shredders for breaking up bales of aluminum and pallets of wood.

3) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

4) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

5) The following VOC and HAP storage containers:

A) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

B) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

6) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

7) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

8) Closed loop heating and cooling systems.

9) Gasoline emergency generators not exceeding 100 horsepower.

10) A laboratory as defined in 326 IAC 2-7-1(21)(D).

A.4 FESOP Applicability [326 IAC 2-8-2]
This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Hammond Department of Environmental Management (HDEM) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]
(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B General Conditions

B.1 Permit No Defense [IC 13]
Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation, or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]
Terms in this permit shall have the meaning assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]
This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]
(a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, HDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by HDEM.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]
The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]
The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]
(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and to:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue - Room 304
Hammond, Indiana 46320

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ and HDEM within a reasonable time, any information that IDEM, OAQ and HDEM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and HDEM copies of records required to be kept by this permit.

(c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]
IDEM, OAQ and HDEM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable

inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15th of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and HDEM on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ and HDEM may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ and HDEM upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and HDEM. IDEM, OAQ and HDEM may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and HDEM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027
(ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

and

HDEM:
Telephone No.: 219-853-6306
Facsimile No.: 219-853-6343

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue - Room 304
Hammond, Indiana 46320

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ and HDEM may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ and HDEM by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated

noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or HDEM determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ or HDEM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or HDEM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or HDEM may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and HDEM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individiual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and to:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue - Room 304
Hammond, Indiana 46320

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and HDEM on or before the date it is due.

(2) If IDEM, OAQ and HDEM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and HDEM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and HDEM any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and to:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue - Room 304
Hammond, Indiana 46320

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana(AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and HDEM in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, HDEM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]
The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);

(2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;

(3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-3 (Emission Offset), potential to emit particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above-specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]
The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]
Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and HDEM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and HDEM if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]
The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Response Plan – Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and HDEM upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ and HDEM shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B – Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C – Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ and HDEM within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ and HDEM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ or HDEM may extend the retesting deadline.

(c) IDEM, OAQ and HDEM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and to:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue - Room 304
Hammond, Indiana 46320

This emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and HDEM on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM with a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and to:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue - Room 304
Hammond, Indiana 46320

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and HDEM on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years.

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:
Point No. 1: **Aluminum Dross Finishing Operation** (Line #2) (Stack No. 1): The larger sized material processing side includes a feed hopper, bucket elevator, and chip shredder. The smaller sized material processing side includes a feed hopper, bucket elevator, Stedman shredder, a second feed hopper, belt conveyor, & Rex mixer. Both sides share a Rotex screener. The maximum design rate of material processed is 6.55 Tons/hr. Particulate emissions are controlled by an American Air Filter Dust Collector #3 (Model 141; Serial No. FR-770039).
A Housekeeping dust collector is used for removing dust from the work areas around Lines #1 and #2 as a health and safety precaution for the workers. A draft is provided using a dust collector, American Air Filters (AAF #4).
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]
Pursuant to 326 IAC 6-1-2(a) (Particulate Emission Limitations), the PM emissions from Point No. 1 Aluminum Dross Finishing Operation shall be limited to 6.17 lbs/hr which is equivalent to 27.03 tons/yr.

D.1.2 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 2-8-4]
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), particulate matter less than 10 microns in diameter (PM10) emissions from this facility shall be set equal to the PM emission limit or 6.17 lbs/hr which is equivalent to 27.03 tons/yr and that visible emissions from this facility shall not exceed 20% opacity. This requirement will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this facility.

Compliance Determination Requirements

D.1.4 Particulate Matter less than 10 microns in diameter (PM10)
The dust collector shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.5 Visible Emissions Notations
(a) Visible emission notations of the Aluminum Dross Finishing Operation exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the dust collector used in conjunction with the Aluminum Dross Finishing Operation (Line #2), at least once per shift when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the dust collector is outside the normal range of 0.1 – 5.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Compliance Response Plan – Failure to Take Response Steps. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C – Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and HDEM and shall be calibrated at least once every six (6) months.

D.1.7 Baghouse Inspections

An inspection shall be performed within the last month of each calendar quarter of all bags controlling the Aluminum Dross Finishing Operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B – Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain a monthly record of the weight of all raw material processed through this facility.

(b) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the Aluminum Dross Finishing Operation stack exhaust once per shift.

(c) To document compliance with Condition D.1.6 the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.

(d) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7 and the dates the vents are redirected.

(e) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:
Point No. 2: **Aluminum Dross and Grindings Unloading to Elevated Storage Silo Operation** (Stack No. 4): This operation includes a feed hopper, bucket elevator, Rotex screener, belt conveyor, screw conveyor, a Williams Separator, and an eight (8) compartment storage silo. The maximum rate of material transfer to the silo is 6.35 Tons/hr. The maximum design rate of the mixer is 2.5 Tons/hr. Particulate emissions are controlled by an American Air Fabric Filter #1 (Model 127; Serial No. AP-750088).
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]
Pursuant to 326 IAC 6-1-2(a), the PM emissions from Point No. 2 Aluminum Dross and Grindings Unloading to Elevated Storage Silo Operation shall be limited to 4.98 lbs/hr which is equivalent to 21.83 tons/yr.

D.2.2 Particulate Matter less than 10 microns in diameter (PM10) [326 2-8-4]
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), particulate matter less than 10 microns in diameter (PM10) emissions from this facility shall be set equal to the PM emission limit or 4.98 lbs/hr which is equivalent to 21.83 tons/yr and that visible emissions from this facility shall not exceed 20% opacity. This requirement will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this facility.

Compliance Determination Requirements

D.2.4 Particulate Matter less than 10 microns in diameter (PM10)
The dust collector shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.5 Visible Emissions Notations

(a) Visible emission notations of the Aluminum Dross and Grindings Unloading to Elevated Storage Silo Operation exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the dust collector used in conjunction with the Aluminum Dross and Grindings Unloading to Elevated Storage Silo Operation at least once per shift when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the dust collector is outside the normal range of 0.8 – 2.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Compliance Response Plan – Failure to Take Response Steps. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C – Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and HDEM and shall be calibrated at least once every six (6) months.

D.2.7 Baghouse Inspections

An inspection shall be performed within the last month of each calendar quarter of all bags controlling the Aluminum Dross and Grindings Unloading to Elevated Storage Silo Operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B – Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then

failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.9 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain a monthly record of the weight of all raw material processed through this facility.

(b) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the Aluminum Dross and Grindings Unloading to Elevated Storage Silo Operation stack exhaust once per shift.

(c) To document compliance with Condition D.2.6, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.

(d) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.

(e) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:
Point No. 3: **Aluminum Bulk Dross Processing Operation** (Line #1) (Stack No. 5): This facility includes a hopper/deister, shaker feeder, belt conveyor, Kolbert hopper & feeder, belt conveyor, Rex mixer, and a Rotex screener. The maximum design rate is 6.55 Tons/hr. Particulate emissions are controlled by a Pangborn Dust Collector (Model No. N-67; Serial No. 67-CH-3-702).
A Housekeeping dust collector is used for removing dust from the work areas around Lines #1 and #2 as a health and safety precaution for the workers. A draft is provided using a dust collector, American Air Filters (AAF #4).
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]
Pursuant to 326 IAC 6-1-2(a), the PM emissions from Point No. 3 Aluminum Bulk Dross Processing Operation shall be limited to 3.31 lbs/hr which is equivalent to 14.51 tons/yr.

D.3.2 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 2-8-4]
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), PM10 emissions from this facility shall be set equal to the PM emission limit or 3.31 lbs/hr which is equivalent to 14.51 tons/yr and that visible emissions from this facility shall not exceed 20% opacity. This requirement will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this facility.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]
During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Condition D.3.1 the Permittee shall perform PM testing utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C – Performance Testing.

D.3.5 Particulate Matter less than 10 microns in diameter (PM10)
The dust collector shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.6 Visible Emissions Notations
(a) Visible emission notations of the Aluminum Bulk Dross Processing Operation exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.3.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the dust collector used in conjunction with the Aluminum Bulk Dross Processing Operation (Line #1), at least once per shift when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the dust collector is outside the normal range of 1.0 – 2.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Compliance Response Plan – Failure to Take Response Steps. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C – Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and HDEM and shall be calibrated at least once every six (6) months.

D.3.8 Baghouse Inspections

An inspection shall be performed within the last month of each calendar quarter of all bags controlling the Aluminum Bulk Dross Processing Operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.3.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B – Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for

completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.10 Record Keeping Requirements

(a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain a monthly record of the weight of all raw material processed through this facility.

(b) To document compliance with Condition D.3.6, the Permittee shall maintain records of visible emission notations of the Aluminum Bulk Dross Processing Operation stack exhaust once per shift.

(c) To document compliance with Condition D.3.7, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.

(d) To document compliance with Condition D.3.8, the Permittee shall maintain records of the results of the inspections required under Condition D.3.8 and the dates the vents are redirected.

(e) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

and

HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-AIR POLLUTION CONTROL DIVISION-

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: **HT Aluminum Specialties, Inc.**
Source Address: 6340 Indianapolis Boulevard, Hammond, Indiana 46320
Mailing Address: 6340 Indianapolis Boulevard, Hammond, Indiana 46320
FESOP No.: **F089-14952-00207**

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

_ Annual Compliance Certification Letter

_ Test Result (specify) _____

_ Report (specify) _____

_ Notification (specify) _____

_ Affidavit (specify) _____

_ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

and

HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AIR POLLUTION CONTROL DIVISION
5925 CALUMET AVENUE
HAMMOND, INDIANA 46320

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) EMERGENCY OCCURRENCE REPORT

Source Name: **HT Aluminum Specialties, Inc.**
Source Address: 6340 Indianapolis Boulevard, Hammond, Indiana 46320
Mailing Address: 6340 Indianapolis Boulevard, Hammond, Indiana 46320
FESOP No.: **F089-14952-00207**

This form consists of 2 pages **Page 1 of 2**

_ This is an emergency as defined in 326 IAC 2-7-1(12)
• The Permittee must notify the Office of Air Quality (OAQ) and the Hammond Department of Environmental Management (HDEM), within four (**4**) business hours (1- 800-451-6027 or 317-233-5674, ask for IDEM Compliance Section) and (219-853-6306, for HDEM); and
• The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967, IDEM and 219-853-6343, HDEM), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected: Was the facility being properly operated at the time of the emergency? Y N Describe: Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-AIR POLLUTION CONTROL DIVISION-

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
Process Weight Rate

Source Name: **HT Aluminum Specialties, Inc.**
Source Address: 6340 Indianapolis Boulevard, Hammond, Indiana 46320
Mailing Address: 6340 Indianapolis Boulevard, Hammond, Indiana 46320
FESOP No.: **F089-14952-00207**

Month: _____ Year: _____

Process Weight Rate (Tons)			
Facility ID	Point 1: Aluminum Dross Finishing Operation (Line #2) with American Air Filter Dust Collector #3 (Stack No. 1)	Point 2: Aluminum Dross and Grindings Unloading to Elevated Storage Silo Operation with American Air Fabric Filter #1 (Stack No. 4)	Point 3: Aluminum Bulk Dross Processing Operation (Line #1) with Pangborn Dust Collector (Stack No. 5)
Day 1			
Day 2			
Day 3			
Day 4			
Day 5			
Day 6			
Day 7			
Day 8			
Day 9			
Day 10			
Day 11			
Day 12			
Day 13			
Day 14			
Day 15			
Day 16			
Day 17			
Day 18			
Day 19			
Day 20			
Day 21			
Day 22			
Day 23			
Day 24			
Day 25			
Day 26			
Day 27			
Day 28			
Day 29			
Day 30			
Day 31			
Month Total			

Submitted by (Name & Title): _____

Signature: _____ Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-AIR POLLUTION CONTROL DIVISION-

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
Pressure Drop Monitoring Form

Source Name: **HT Aluminum Specialties, Inc.**
Source Address: 6340 Indianapolis Boulevard, Hammond, Indiana 46320
Mailing Address: 6340 Indianapolis Boulevard, Hammond, Indiana 46320
FESOP No.: **F089-14952-00207**

Month: _____ Year: _____

	ΔP Reading (inches of water)		
Facility ID	Point 1: Aluminum Dross Finishing Operation (Line #2) with American Air Filter Dust Collector #3 (Stack No. 1)	Point 2: Aluminum Dross and Grindings Unloading to Elevated Storage Silo Operation with American Air Fabric Filter #1 (Stack No. 4)	Point 3: Aluminum Bulk Dross Processing Operation (Line #1) with Pangborn Dust Collector (Stack No. 5)
ΔP Range	0.1 - 5.0	0.8 - 2.0	1.0 - 2.5
Day 1			
Day 2			
Day 3			
Day 4			
Day 5			
Day 6			
Day 7			
Day 8			
Day 9			
Day 10			
Day 11			
Day 12			
Day 13			
Day 14			
Day 15			
Day 16			
Day 17			
Day 18			
Day 19			
Day 20			
Day 21			
Day 22			
Day 23			
Day 24			
Day 25			
Day 26			
Day 27			
Day 28			
Day 29			
Day 30			
Day 31			

Submitted by (Name & Title): _____

Signature: _____ Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-AIR POLLUTION CONTROL DIVISION-

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
FESOP-Visual Emissions Notations Form

Source Name: **HT Aluminum Specialties, Inc.**
Source Address: 6340 Indianapolis Boulevard, Hammond, Indiana 46320
Mailing Address: 6340 Indianapolis Boulevard, Hammond, Indiana 46320
FESOP No.: **F089-14952-00207**

Month: _____ Year: _____

	Visible Emission Notations (Normal or Abnormal)		
Facility ID	Point 1: Aluminum Dross Finishing Operation (Line #2) with American Air Filter Dust Collector #3 (Stack No. 1)	Point 2: Aluminum Dross and Grindings Unloading to Elevated Storage Silo Operation with American Air Fabric Filter #1 (Stack No. 4)	Point 3: Aluminum Bulk Dross Processing Operation (Line #1) with Pangborn Dust Collector (Stack No. 5)
Day 1			
Day 2			
Day 3			
Day 4			
Day 5			
Day 6			
Day 7			
Day 8			
Day 9			
Day 10			
Day 11			
Day 12			
Day 13			
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Day 21			
Day 22			
Day 23			
Day 24			
Day 25			
Day 26			
Day 27			
Day 28			
Day 29			
Day 30			
Day 31			

Submitted by (Name & Title): _____

Signature: _____ Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

and

HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AIR POLLUTION CONTROL DIVISION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: **HT Aluminum Specialties, Inc.**
Source Address: 6340 Indianapolis Boulevard, Hammond, Indiana 46320
Mailing Address: 6340 Indianapolis Boulevard, Hammond, Indiana 46320
FESOP No.: **F089-14952-00207**

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
_ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
_ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

and

Hammond Department of Environmental Management

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

HT Aluminum Specialties, Inc.
6340 Indianapolis Boulevard
Hammond, Indiana 46320

F089-14952, Plt ID-089-00207

On December 5, 2002, the Hammond Department of Environmental Management (HDEM) had a notice published in the Times, Hammond, Indiana, stating that HT Aluminum Specialties, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate an Aluminum Scrap and Waste Processing Plant. The notice also stated that HDEM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments received after the public notice period are as follows:

On January 13, 2003, HDEM made the following corrections/changes to the proposed FESOP Renewal (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

1. On page 2 of 46 of the permit, under Table of Contents, Section A Source Summary, Condition A.5 Prior Permits Superseded, the appropriate rule cite has been added.

   A.5 Prior Permits Superseded **[326 IAC 2-1.1-9.5]**

2. On page 3 of 46 of the permit, under Table of Contents, Section D.1 Facility Operation Conditions, Record Keeping and Reporting Requirements, Condition D.1.10 Reporting Requirements has been deleted.

   ~~D.1.10 Reporting Requirements~~

3. On page 4 of 46 of the permit, under Table of Contents, Section D.2 Facility Operation Conditions, Record Keeping and Reporting Requirements, Condition D.2.10 Reporting Requirements has been deleted.

   ~~D.2.10 Reporting Requirements~~

4. On page 4 of 46 of the permit, under Table of Contents, Section D.3 Facility Operation Conditions, Condition D.3.10 Reporting Requirements has been deleted. Also Condition D.3.4 Particulate Matter less than 10 microns in diameter (PM10) has been renamed to Condition D.3.4 Testing Requirements. Condition D.3.5 has been renamed to Particulate Matter less than 10 microns in diameter (PM10) and conditions following were renamed and renumbered accordingly.

Compliance Determination Requirements
D.3.4 ~~Particulate Matter less than 10 microns in diameter (PM10)~~ **Testing Requirements**
D.3.5 Particulate Matter less than 10 microns in diameter (PM10)

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
~~D.3.5 Visible Emissions Notations~~
D.3.6 ~~Parametric Monitoring~~ **Visible Emissions Notations**
D.3.7 ~~Baghouse Inspections~~ **Parametric Monitoring**
D.3.8 ~~Broken or Failed Bag Detection~~ **Baghouse Inspections**
D.3.9 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]
D.3.~~9~~**10** Record Keeping Requirements
~~D.3.10 Reporting Requirements~~

5. On page 5 of 46 of the permit, under Section A, Condition A.1 General Information, the Source Address and Mailing Address were incorrect and changed accordingly.

Source Address: 6~~2~~**3**40 Indianapolis Boulevard, Indiana 46320
Mailing Address: 6~~2~~**3**40 Indianapolis Boulevard, Indiana 46320

6. On page 7 of 46 of the permit, under Section A, Condition A.3 Insignificant Activities, 10) the rule cite was incorrect.

10) A laboratory as defined in 326 IAC 2-7-1(~~20~~**21**)(D).

7. On page 23 of 46 of the permit, under Section C, Condition C.16 Compliance Response Plan – Preparation, Implementation, Records, and Reports (b)(3), HDEM was added.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ **and HDEM** shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

Indiana Department of Environmental Management
Office of Air Quality
and
Hammond Department of Environmental Management
- Air Pollution Control Division-

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	HT Aluminum Specialties, Inc.
Source Location:	6340 Indianapolis Boulevard, Hammond, Indiana 46320
County:	Lake
SIC Code:	5093 – Scrap and Waste Materials
Operation Permit No.:	F089-14952-00207
Permit Reviewer:	Debra Malone, HDEM

The Hammond Department of Environmental Management (HDEM) has reviewed a FESOP renewal application from HT Aluminum Specialties, Inc. relating to the operation of an Aluminum Scrap and Waste Processing Plant. HT Aluminum Specialties, Inc. was issued FESOP 089-7823-00207 on June 17, 1997.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Point No. 1: Aluminum Dross Finishing Operation

This operation is also known as Line #2 by plant personnel. This facility includes two (2) separate process lines, one for the bigger size material (+0.5 inch) and the other for the smaller size material (+30 mesh).

The +0.5 inch side includes a feed hopper where the material dumped is fed to the Chip Shredder via a bucket elevator. Each of these points is vented to the air pollution control equipment.

The +30 mesh side includes a feed hopper where the material dumped is fed to a Stedman Shredder via a bucket elevator. The material then feeds to another feed hopper, belt conveyor and Rex Mixer.

Both sides share a Rotex Screener to separate the various size materials. This unit is also drafted to the air pollution control equipment.

The maximum design rate through the entire operation is 6.55 Tons/hour.

The air pollution control equipment for this operation is an American Air Filter Dust Collector #3 (Model 141; Serial No. FR-770039) which vents through Stack 1.

A Housekeeping dust collector is used for removing dust from the work areas around Lines #1 and #2 as a health and safety precaution for the workers. A draft is provided using a dust collector, American Air Filters (AAF #4).

Point No. 2: Aluminum Dross and Grindings Unloading to Elevated Storage Silo Operation

The Aluminum Dross & Grindings Unloading to Elevated Storage Silo Operation involves the unloading of aluminum dross and grindings into an eight (8) compartment storage silo. Each compartment has a maximum capacity of 20,000 lbs. The material is unloaded and conveyed to the silo by means of a feed hopper and bucket elevator. The material then goes through a Rotex Screener, a belt conveyor, a screw conveyor, and then through a Williams Separator. The maximum amount of material unloaded is 6.35 tons/hr.

The Air Separator receives material from the small silo under the rail car pit. The Air Separator uses a blade separation method to separate the fines from the larger material. The material is then released into two (2) separate bags at the bottom of the separator.

Particulate emissions generated are controlled by an American Air Fabric Filter #1 (Model 127; Serial No. AP-750088), rated at 99% control efficiency.

Point No. 3: Aluminum Bulk Dross Processing Operation

This operation is also known as Line #1 by plant personnel. A dump truck would dump material into a Hopper/Deister Shaker Feeder which feeds the Kolbert Hopper & Feeder via a belt conveyor. The material is then fed to a Rex 7.5 yard mixer via another belt conveyor, and then through a Rotex Screener.

The maximum design rate for this facility is 6.55 Tons per hour.

Particulate matter emissions generated from this operation are controlled by a Pangborn Dust Collector (Model No. N-67; Serial No. 67-CH-3-702).

A Housekeeping dust collector is used for removing dust from the work areas around Lines #1 and #2 as a health and safety precaution for the workers. A draft is provided using a dust collector, American Air Filters (AAF #4).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

1) **Point No. 4: Aluminum Sorting Line**

The Sorting Line consists of: (1) an initial conveyor where workers will separate the large pieces of non-aluminum material from +10 to +20 mesh aluminum dross and grindings and (2) a secondary conveyor where non-aluminum material is further separated using a "Dings" Eddy Current Separator. The Eddy Current Separator uses a magnetic rotor to repel aluminum grindings farther than nonmetallic material.

Emissions are generated by the delivery of material to the line and removal of material from the end of the line. The maximum design rate for this facility is 6 tons per hour. No air pollution control equipment is used for this line.

2) Miscellaneous shredders used for breaking up bales of aluminum and pallets of wood.

3) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

4) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

5) The following VOC and HAP storage containers:

A) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

B) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

6) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

7) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

8) Closed loop heating and cooling systems.

9) Gasoline emergency generators not exceeding 100 horsepower.

10) A laboratory as defined in 326 IAC 2-7-1(20)(D).

Existing Approvals

(a) FESOP 089-7823-00207, issued on June 17, 1997; and expiring on June 17, 2002.

(b) First Administrative Amendment AAF089-11210-00207, issued August 26, 1999.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on September 17, 2001.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 4).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	307.534
PM-10	307.512
SO_2	0
VOC	Negligible
CO	0
NO_x	0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
TOTAL HAPS	0

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of Particulate Matter less than 10 microns (PM10) is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on June 17, 1997, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F089-7823-00207; issued on June 17, 1997).

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Total PTE After Issuance	64.126	64.152	Negligible	Negligible	Negligible	Negligible	Negligible

PM emissions are limited in accordance with 326 IAC 6-3-2. PM10 emissions were set equal to the PM.

VOC, SO2, NOx, CO, and HAPs emissions are negligible.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Moderate Nonattainment
SO_2	Primary Nonattainment
NO_2	Unclassifiable/Attainment
Ozone	Severe Nonattainment
CO	Unclassifiable/Attainment
Lead	Attainment

40 CFR Part 81.315 Indiana

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

Federal Rule Applicability

(a) The Aluminum Dross Finishing Operation and Aluminum Bulk Dross Processing Operation involve pollutant-specific emission units:

(1) with the potential to emit before controls equal to or greater than one hundred (100) tons per year, and

(2) that are subject to an emission limit and have a control device that are necessary to meet that limit.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable.

(b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(c) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart S – Primary Aluminum Reduction Plants), since there are no affected facilities to which this subpart applies.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

(e) The degreasing operation is not subject to the 40 CFR Part 63, Subpart T, National Emission Standards for Halogenated Solvent Cleaning because the solvent used in the degreasing operation is not any of the listed regulated solvents.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on April 18, 1997. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-3 (Emission Offset)

This source is a major stationary source because it has the potential to emit Particulate Matter less than 10 microns (PM10) at 100 TPY or more. This source predates the 326 IAC 2-3 (Emission Offset) rule. The source has not been reviewed under the requirements of 326 IAC 2-3 because there has not been a major modification, as defined in these rules, subject to the requirements of 326 IAC 2-3.

326 IAC 2-4.1-1 (New source toxics control)

This source is not subject to 2-4.1-1 (New source toxics control), because it is not a major source of hazardous air pollutants that was constructed or reconstructed after July 27, 1997.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of Particulate Matter less than 10 microns (PM10). Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received by April 15th of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

The source is in compliance with the required emission statement submittals.

326 IAC 5-1 (Visible Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of twenty percent (20%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

No violations of the opacity standards have been observed at this source.

State Rule Applicability - Individual Facilities

326 IAC 6-1-1 (Nonattainment Area Limitations – Applicability)

Pursuant to 326 IAC 6-1-1 (Nonattainment Area Limitations – Applicability), sources or facilities that are: (1) located in the counties listed in section 7 of this rule; (2) but which sources or facilities are not specifically listed in section 7 of this rule; and (3) have the potential to emit one hundred (100) tons or more of particulate matter per year or have actual emissions of ten (10) tons or more of particulate matter per year; shall comply with limitations of applicable sections that follow.

This source is applicable to this rule because it is located in Lake County and has the potential to emit one hundred (100) tons or more of particulate matter per year.

326 IAC 6-1-2(a) (Particulate emission limitations)

Facilities not limited by any other subsection in this section shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)).

326 IAC 8-1-6 (New facilities; general reduction requirements)

No facility at this source is applicable to this rule because VOC emissions are less than 25 tons per year.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

This rule does not apply to this source because the source does not have potential emissions of one hundred (100) tons or greater per year of VOC and it does not have a facility of the type described in the rule.

326 IAC 8-7-2 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties – Applicability)

This rule does not apply to this source because the source does not emit or have the potential to emit volatile organic compounds (VOCs) at levels equal to or greater than twenty-five (25) tons per year (tpy) in Lake County.

Local Rule Applicability

Hammond Air Quality Control Ordinance No. 3522 (as amended)

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended) the Particulate Matter less than 10 microns (PM10) emissions limitations have been set equal to the Particulate Matter (PM) emissions limitations.

Testing Requirements

Compliance stack tests are required on the following facilities to demonstrate compliance with the applicable particulate matter (PM) emission limits.

1) Aluminum Dross Finishing Operation
2) Truck Dumping Aluminum Dross with Shredding and Screening
3) Aluminum Dross and Grindings Unloading to Elevated Storage Silo Operation
4) Aluminum Bulk Dross Processing Operation

Two of the above four points shall be tested each permit term. The remaining two (2) points shall be tested during the following permit term.

All testing requirements from previous approvals were incorporated into this FESOP except for the Truck Dumping Aluminum Dross with Shredding and Screening process which was eliminated from the FESOP per First Administrative Amendment 089-11210 on August 26, 1999.

Previous stack tests to comply with this requirement were conducted on:

1) Aluminum Dross Finishing Operation; PM test performed on June 12, 2002.
2) Aluminum Dross and Grindings Unloading to Elevated Storage Silo Operation; PM test performed on June 13, 2002.

The Aluminum Bulk Dross Processing Operation shall be tested during this permit term.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

1. A compliance stack test is required on the following facility to demonstrate compliance with the applicable particulate matter (PM) emission limit.

   a) Aluminum Bulk Dross Processing Operation

   This monitoring condition is necessary to ensure compliance with 326 IAC 6-1-2(a), Hammond Air Quality Control Ordinance No. 3522 (as amended), and 326 IAC 2-8 (FESOP).

2. The following facilities have applicable compliance monitoring conditions as specified below:

a) The total static pressure drop across the control equipment must be measured and recorded daily. The pressure drop for the units shall be maintained within the following ranges in inches of water.

Control Unit ID	∆P range (inches of water)
Point 1: Aluminum Dross Finishing Operation - American Air Filter Dust Collector #3	0.1 - 5.0
Point 2: Aluminum Dross and Grindings Unloading to Elevated Storage Silo Operation - American Air Filter Dust Collector #1	0.8 - 2.0
Point 3: Aluminum Bulk Dross Processing Operation - Pangborn Dust Collector	1.0 - 2.5

If the pressure drop is outside this range for more than two consecutive readings, corrective action shall be taken in accordance with the Preventive Maintenance Plan.

b) Once per shift visual emission notations are required for all stacks.

c) Daily records of the total weight of raw material processed through each point are required.

d) Results of baghouse inspections and the dates the vents were redirected shall be maintained in accordance with the permit.

e) All records shall be maintained in accordance with the permit.

These monitoring conditions are necessary because the particulate matter control equipment associated with each facility must be operated properly to ensure compliance with 326 IAC 6-1-2(a) (Particulate Emission Limitations), Hammond Air Quality Control Ordinance No. 3522 (as amended), and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this **Aluminum Scrap and Waste Processing Plant** shall be subject to the conditions of the attached proposed **(FESOP No.: F089-14952-00207).**

Appendix A: Source Emissions Calculations

HT Aluminum Specialties, Inc.
6340 Indianapolis Blvd.
Hammond, IN 46320

PLANT ID NO: 089-00207
INSP DATE: 7/9/02
CALC DATE: 4/18/02

CALCULATIONS BY: Kristina Massey

YEAR OF DATA: 2001

NO. OF POINTS: 4

NOTES
EF: EMISSION FACTOR
CE: CONTROL EFFICIENCY
MDR: MAXIMUM DESIGN RATE
MDC: MAXIMUM DESIGN CAPACITY
Ts: STACK DISCHARGE TEMPERATURE
UNITS FOR EMISSIONS ARE IN (TPY) EXCEPT WHERE GIVEN

****

Point ID:1 (Stack S1) — **Line #2 - Aluminum Dross Finishing Operation** (Mixing & Screening)

MDR (T/hr): 6.55
YEARLY PROD (T/yr): 9,550
STACK ID (DIAM:HEIGHT): (2.22': 7')
FLOWRATE (ACFM): 24000
Ts(°F): 70

CNTRL DEV: Amer. Air Filter DC (Model 141; Serial No. FR-770039)
SCC #3-04-001-60

Permitted operating hrs: **8760** hr/yr

			POTENTIAL EMISSIONS						ALLOWABLE		COMPANY ACTUAL	
			BEFORE CONTROLS			AFTER CONTROLS					BEFORE	AFTER
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)	CONTROLS	CONTROLS
PM	3.55	0.99	23.2653	558.3673	**101.9020**	0.2327	1.0190	0.0011	6.17	27.03	16.9606	0.1696
PM10	3.55	0.99	23.2653	558.3673	**101.9020**	0.2327	1.0190	0.0011	6.17	27.03	16.9606	0.1696
SOx	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
NOx	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
VOC	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
CO	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
LEAD	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000

EF based on stack test performed on 6/12/02.
EF = 0.228 lbs/hr/(1-0.99)/6.419 = 3.55 LB/T

Opacity: 326 IAC 5-1-2(2)(B): 20%
PM: 326 IAC 6-1-2(a): 0.03 gr/dscf
PM10: Hammond AQC Ordinance #3522 (as amended)

****

Point ID:2 (Stack S4) — **Aluminum Dross/Grindings Unloading to Elevated Storage Silo Operation**

MDR (T/hr): 6.35
YEARLY PROD (T/yr): 653
STACK ID (DIAM:HEIGHT): (3.43': 8')
FLOWRATE (ACFM): 19380
Ts(°F): 70

CNTRL DEV: Amer. Air Filter DC (Model No. 127; Serial #AP-750088)
SCC #3-05-011-07

Permitted operating hrs: **8760** hr/yr

			POTENTIAL EMISSIONS						ALLOWABLE		COMPANY ACTUAL	
			BEFORE CONTROLS			AFTER CONTROLS					BEFORE	AFTER
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)	CONTROLS	CONTROLS
PM	2.64	0.99	16.7640	402.3360	**73.4263**	0.1676	0.7343	0.0010	4.98	21.8274	0.8620	0.0086
PM10	2.64	0.99	16.7640	402.3360	**73.4263**	0.1676	0.7343	0.0010	4.98	21.8274	0.8620	0.0086
SOx	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
NOx	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
VOC	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
CO	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
LEAD	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000

EF based on stack test performed on 6/12/02.
EF = 0.162 lbs/hr/(1-0.99)/6.14 = 2.64 LB/T

Opacity: 326 IAC 5-1-2(2)(B): 20%
PM: 326 IAC 6-1-2(a): 0.03 gr/dscf
PM10: Hammond AQC Ordinance #3522 (as amended)

Point ID: 3 (Stack S5) | **Line #1 - Aluminum Bulk Dross Processing Operation**

MDR (T/hr): 6.55 | YEARLY PROD (T/yr): 14,236 | STACK ID (DIAM:HEIGHT): (2': 12') | FLOWRATE (ACFM): 12879 | Ts(°F): 70

CNTRL DEV: Pangborn DC (Model N-67-CH-3; Serial #67-CH-3-702) Stack Test - 1/15/92

Permitted operating hrs: **8760** hr/yr

			POTENTIAL EMISSIONS						ALLOWABLE		COMPANY ACTUAL	
			BEFORE CONTROLS			AFTER CONTROLS					BEFORE	AFTER
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)	CONTROLS	CONTROLS
PM	4.58	0.97	30.0100	720.2400	**131.4438**	0.9003	3.9433	0.0082	3.31	14.51	32.6124	0.9784
PM10	4.58	0.97	29.9990	719.9760	**131.3956**	0.9000	3.9419	0.0082	3.31	14.51	32.6004	0.9780
SOx	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
NOx	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
VOC	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
CO	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
LEAD	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000

Opacity: 326 IAC 5-1-2(2)(B): 20%
PM: 326 IAC 6-1-2(a): 0.03 gr/dscf
PM10: Hammond AQC Ordinance #3522 (as amended)

Stack Test 1/15/92: Avg. PM loading: baghouse inlet = 30.01 lbs/hr; baghouse outlet = 0.866 lbs/hr.
Avg. Dust Collector Efficiency was 97.01%.
Process Production during the stack test was 6.55 Tons/hr (42,580 lbs of dross during a 3 hour and 15 minute period).
Avg. downtime was 15%.

E.F. = (30.01 lbs/hr)/ (6.55 tons/hr) = 4.58 lbs/ton

Stack Test 1/15/92 showed 0.47% of dross material processed was lost (released due to on-line processing activity), 61.57 lbs/hr.
The Dust Collector captured 48.7% of the total dross material lost.

****Designated as an Insignificant Activity****

Point ID: 4 (Stack S6) | **Aluminum Sorting Line**

MDR (T/hr): 6 | YEARLY PROD (T/yr): 0.0 | STACK ID (DIAM:HEIGHT): no stack | FLOWRATE (ACFM): N/A | Ts(°F): N/A

CNTRL DEV: none

Secondary Metal Production
Aluminum - Material Handling
SCC #3-04-001-60

Permitted operating hrs: **8760** hr/yr

			POTENTIAL EMISSIONS						ALLOWABLE		COMPANY ACTUAL	
			BEFORE CONTROLS			AFTER CONTROLS					BEFORE	AFTER
POLLUTANT	*EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)	CONTROLS	CONTROLS
PM	0.029	0	0.174	4.176	0.762	0.174	0.762	N/A	0.174	0.762	0.000	0.000
PM10	0.030	0	0.180	4.320	0.788	0.180	0.788	N/A	0.180	0.788	0.000	0.000
SOx	0.000	0	0.000	0.000	0.000	0.000	0.000	N/A	N/A	N/A	0.000	0.000
NOx	0.000	0	0.000	0.000	0.000	0.000	0.000	N/A	N/A	N/A	0.000	0.000
VOC	0.000	0	0.000	0.000	0.000	0.000	0.000	N/A	N/A	N/A	0.000	0.000
CO	0.000	0	0.000	0.000	0.000	0.000	0.000	N/A	N/A	N/A	0.000	0.000
LEAD	0.000	0	0.000	0.000	0.000	0.000	0.000	N/A	N/A	N/A	0.000	0.000

Opacity: 326 IAC 5-1-2(2)(B): 20%
PM: Hammond AQC Ordinance No. 3522 (as amended)
Construction Permit #00286 Issued 3/12/96
Operation Permit #603

Emission Factor based on SCC #3-05-011-06 - Concrete Batching - Transfer: Sand/Aggregate to Elevated Bins

Sorting Line consists of: Initial conveyor where humans separate large pieces of non-aluminum material from +10 to +20 mesh aluminum dross, grindings, and saw fines.
Secondary conveyor where non-aluminum material is further separated using a "Dings" Eddy Current Separator.

Plant Totals: H.T. Aluminum Specialties, Inc.

	POTENTIAL EMISSIONS						ALLOWABLE		COMPANY ACTUAL	
	BEFORE CONTROLS			AFTER CONTROLS					BEFORE	AFTER
POLLUTANT	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)	CONTROLS	CONTROLS
PM	70.2133	1,685.1193	307.5343	1.4746	6.4587	0.0103	14.641	64.126	50.4349	1.1566
PM10	70.2083	1,684.9993	307.5124	1.4803	6.4836	0.0103	14.647	64.152	50.4230	1.1562
SOx	0.0000	0.0000	0.0000	0.0000	0.0000	#VALUE!	#VALUE!	#VALUE!	0.0000	0.0000
NOx	0.0000	0.0000	0.0000	0.0000	0.0000	#VALUE!	#VALUE!	#VALUE!	0.0000	0.0000
VOC	0.0000	0.0000	0.0000	0.0000	0.0000	#VALUE!	#VALUE!	#VALUE!	0.0000	0.0000
CO	0.0000	0.0000	0.0000	0.0000	0.0000	#VALUE!	#VALUE!	#VALUE!	0.0000	0.0000
LEAD	0.0000	0.0000	0.0000	0.0000	0.0000	#VALUE!	#VALUE!	#VALUE!	0.0000	0.0000

***This source is classed "Major" according to the potential PM and PM10 emissions.**

Total Source Limits are:
VOC - 25 TPY
Single HAP - 10 TPY
Combination of HAPs - 25 TPY
All Other Regulated Pollutants - 100 TPY

Insignificant Activities at the Plant

1) Point No. 4 Aluminum Sorting Line
The Sorting Line consists of: (1) an initial conveyor where workers will separate the large pieces of non-aluminum material from +10 to +20 mesh aluminum dross and grindings and (2) a secondary conveyor where non-aluminum material is further separated using a "Dings" Eddy Current Separator. The Eddy Current Separator uses a magnetic rotor to repel aluminum grindings farther than nonmetallic material.

Emissions are generated by the delivery of material to the line and removal of material from the end of the line. The maximum design rate for this facility is 6 tons per hour. No air pollution control equipment is used for this line.

2) Miscellaneous shredders used for breaking up bales of aluminum and pallets of wood.

3) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

4) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(For fueling company vehicles only. One ≈ 55 gallon tank (drum) for gasoline and one for diesel).

5) The following VOC and HAP storage containers:
A) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
B) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

6) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

7) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(Safety-Kleen. 0 - 0.5 w/o Perc, 0 - 0.5 w/o 1,1,1 trichloroethane).

8) Closed loop heating and cooling systems.

9) Gasoline emergency generators not exceeding 100 horsepower.

(10 hp unit)

10) A laboratory as defined in 326 IAC 2-7-1(20)(D).

(Testing for aluminum content of all in-coming and out-going material).

Previously
Point 2: Shaking and Packaging Aluminum Operation (Stack No. 2): has been requested to be deleted from permitting.
This unit was operated at HT's previous site and the Operation Permit maintained for future permitting ease. However, this facility has not been operated in the last five years. The company has now decided to eliminate this facility from permitting altogether.

Previously
Point 3: Truck Dumping Aluminum Dross with Shredding and Screening (Line #3) (Stack No. 3)
Line #3 has been eliminated from the FESOP. The Aget Dust Collector which was part of Line #3 will now be utilized as a collector for the insignificant emissions generated by fork-lifts in the production building.